



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Economic Support
Bureau of Work Support Programs

**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
Child Care Coordinators
W-2 Agencies**

FROM: Stephen M. Dow
Policy Analysis and Program Implementation Unit
Work Programs Section

BWSP OPERATIONS MEMO

No.: 00-25

File: 1101

Date: 03/31/2000

Non W-2 ☒ **W-2** ☒ **CC** ☒

PRIORITY: Medium

**SUBJECT: DOCUMENTING SENSITIVE INFORMATION IN CARES AND ACCESS
TO CARES INFORMATION**

CROSS REFERENCE: BWSP Operations Memo 00-07
Income Maintenance Manual, Chapter II, Part B
DES Security Manual
§51.30 (4)(d), Wis. Stat.
Wisconsin Administrative Code HHS 92.03 (3) & 92.06
Code of Federal Regulation 42 CFR Part 2.

EFFECTIVE DATE: Immediately

PURPOSE

This memo:

1. Obsoletes BWSP Operations Memo 00-07 ["Alcohol & Other Drug Abuse (AODA) and Mental Health (MH) Confidentiality"].
2. Replaces Release of Information, forms DES-10779 and DES- 10779-1, with a new combined form, DES-10779.
3. Explains the proper documentation of sensitive information in CARES Case Comments.
4. Clarifies confidentiality and security requirements for individuals with CARES access.

OBTAINING CONFIDENTIAL INFORMATION

DES uses 2 forms (DES-10779 and DES-10779-1) for the release of confidential information from alcohol and other drug abuse (AODA) and/or mental health (MH) services providers. W-2 and County/Tribal Human/Social Service agencies have had difficulties in obtaining information from AODA/MH providers because these forms do not meet federal and state requirements for the release of this information.

Effective immediately, DES-10779 is revised and DES-10779-1 is obsolete. It is not necessary to have 2 forms since the revised DES-10779 serves the purpose of both.

Begin immediate use of DES-10779 (R. 12/99), *Authorization for Disclosure of Confidential Information*, which is attached.

The revised form meets federal and state requirements for the confidential release of information, including AODA, MH, and AODA/MH. It ensures that communication between the treatment provider and the W-2 and county/tribal human/social service agency will occur. It also allows for better coordination of activities, development/revision of the Employability Plan, and the ability to receive attendance records and progress summaries.

The forms retention policy for DES-10779 still applies (see Operations Memo 98-82). Obtain DES-10779 (R. 12/99) from:

1. DES Forms Repository at: <http://workweb.dwd.state.wi.us/Notespub/bwiforms/default.htm>.
2. Barb Albrecht
201 E. Washington Ave.
P.O. Box 7935
Madison, WI 53707-7935
Fax: (608) 267-3240
Email: albrecba@dwd.state.wi.us

DOCUMENTATION IN THE PARTICIPANT'S CASE AND CARES RECORD

The Department of Workforce Development requires comments as a formal record of case action or program-related information for an individual. Workers should record comments immediately to ensure a sequential history. When comments are warranted they must be made no later than 24 hours after the action or contact with a participant.

Cross-referencing of sensitive legally confidential information about barriers must occur in CMCC. However, any legally confidential information must only be generally referenced with further details being secured. They may be kept in the paper file, but should be in a sealed envelope. Documentation of sensitive barriers includes but are not limited to:

1. AODA Treatment
2. Mental Health Treatment
3. Domestic Violence Counseling
4. HIV/AIDS

Examples of Documenting Sensitive Information in CMCC:

1. "Participant has been referred for Mental Health Assessment. The assessment will be completed the week of March 20th for a total of 35 hours."
2. "Participant is currently receiving AODA treatment 10 hours per week. See paper file for assessments and treatment notes."
3. "Participant is currently restricted per completed medical capacity form to no more than 30 minutes of continuous sitting or standing. Participant is scheduled for back surgery in two weeks. The Dr. estimates a 12-week recovery period. Participant will remain exempt from the FSET program. Updated ANDI and AIWP accordingly. Paper file has complete medical information and diagnosis provided by the Doctor."

The specific details of sensitive patient information should always occur in the paper case record. Sensitive participant information may include but is not limited to:

1. Details of Assessments
2. Medical Test results
3. Treatment Notes
4. Medical Diagnosis

CONFIDENTIALITY LAW

The laws governing protection of confidentiality of personal health information such as that related to mental health, developmental disabilities, and drug and alcohol treatment are stricter than most other confidentiality rules. In general, they narrowly restrict the disclosure and use of "patient identifying" information to a "bona fide need to know". Patient identifying information is information that reveals that a person is receiving, has received, or has applied for treatment.

These regulations apply to holders, recipients, and seekers of patient identifying information. An individual or program in possession of such information (for example, a federally assisted substance abuse program) may not release it except as authorized by the patient. Anyone who receives such information from a substance abuse program (for example, a W-2 agency) may not again disclose it without patient consent and cannot retain this information in a location where absolute patient confidence cannot be maintained.

However, the restrictions on disclosure do not apply to communications of information between or among personnel having a need for the information in connection with their duties if the communications are:

1. Within a program; **or**,
2. Between a program and an entity that has direct administrative control over the program.

PARTICIPANT CONFIDENTIALITY

All sensitive and confidential information obtained regarding clients will be maintained in a secure confidential manner. This can be accomplished by placing the documentation into an envelope, sealing and storing it in a file that is under lock and key and away from areas frequented by persons who would not normally need to view such information as part of their job.

Any information received or reviewed regarding participants can only be obtained and used to administer the programs which you are contracted to provide under the W-2 contract and the IM

contract. Any unauthorized use or disclosure of CARES, KIDS, Social Security Administration matches, and all other received materials could result in prosecution under the law.

Agency authorities and staff need to ensure that reasonable and prudent procedures are in place to control access to information so as to ensure the privacy of our participants and to protect the staff from potential sanctions under the confidentiality laws.

CASE COMMENTS: A Self-Study Guide for Eligibility Workers and Case Managers

Attached is a new desktop guide on case comments for W-2, Food Stamps, Medicaid, and Child Care cases. The material includes information on the importance of case comments, best practices, the documentation of sensitive issues and other relevant information.

This desktop guide offers information on uniform methods for how and where to document comments.

CONTACTS

Regional Offices

Area Administrator

Central Office

DES CARES and Policy Call Center:

Email: carpolcc@dwd.state.wi.us
Phone: 608-261-6317 (Option #1)
Fax: 608-261-6968

Note: Email contacts are preferred. Thank you.

AUTHORIZATION FOR DISCLOSURE OF CONFIDENTIAL INFORMATION

Regarding the records of:

Name (Last, First, MI)	Date of Birth		
Social Security Number (SSN)	PIN		
Address	City	State	Zip Code

I hereby authorize the disclosure of any confidential information I provide or that is otherwise obtained about me to the W-2, County or Tribal Human/Social Services agency. I also agree that information about my condition and/or treatment may be communicated among personnel at these offices who have a need for the information in connection with their duties.

I hereby authorize and request:

W-2, County or Tribal Human/Social Services Agency	Telephone ()		
Address	City	State	Zip Code

TO: ☐ **Disclose to** ☐ **Receive from** ☐ **Or exchange information with**

Name of Agency/Organization/Person	Telephone ()		
Address	City	State	Zip Code

This information is needed for eligibility determination/continuation, the development/revision of the above named individual's Employability Plan, communication, progress summaries, attendance verification, and/or establishment of good cause for non-cooperation with child support requirements.

Type or extent of information to be disclosed (Check ☒ all applicable categories)

- | | | |
|---|--|--|
| <input type="checkbox"/> Psychiatric/ Mental Health | <input type="checkbox"/> Alcohol and Drug | <input type="checkbox"/> Medical |
| <input type="checkbox"/> Legal | <input type="checkbox"/> School Attendance | <input type="checkbox"/> Domestic Violence |
| <input type="checkbox"/> Financial | <input type="checkbox"/> Specific Request: | |

	Psychiatric Evaluation including Diagnosis/Prognosis		Medical Reports/Physical Exams including Diagnosis/Prognosis
	Psychiatric/Psychotherapy Progress Summaries		Urinalysis Results
	Psychological Evaluation		Treatment Plans
	Alcohol/Drug Initial Assessment/Evaluation		Psychosocial History
	Attendance Records		AODA Progress Summaries
	Bank Records		Birth, Marriage, and Divorce Records
	Legal Records		Employment Records

I understand that I may revoke this authorization, in writing, at any time except where information has already been released as a result of this authorization. This authorization will automatically expire one year from the date of signature unless indicated and initialed below.

Authorization expires as of ____/____/____ (Date)

Authorization expires after the following action takes place:_____

Wisconsin Statute s 51.30 (4)(d), Wisconsin Administrative Code ss. HHS 92.03 (3), and 92.06, and 42 CFR Part 2.

White: Disclosing Agency

Yellow: Participant

Pink: Case Record

By my signature below, I hereby affirm that I have read and agree with everything stated in this document.

THIS FORM MUST BE SIGNED AND DATED BY THE PARTICIPANT (OR A PERSON LEGALLY AUTHORIZED TO DISCLOSE FOR THE PARTICIPANT) AND A WITNESS FROM THE W-2, COUNTY OR TRIBAL HUMAN/SOCIAL SERVICES AGENCY FOR THE DISCLOSURE OF THE REQUESTED INFORMATION TO OCCUR.

Participant's Signature	Date Signed
Person Legally Authorized to Disclose for the Participant's Signature	Date Signed
Agency Witness's Signature	Date Signed

THE FOLLOWING APPLIES TO YOU ONLY IF THE RECORDS AUTHORIZED FOR RELEASE ON REVERSE SIDE RELATE TO YOUR TREATMENT FOR MENTAL ILLNESS, DEVELOPMENTAL DISABILITIES, ALCOHOL, OR DRUG ABUSE:

The patient who is the subject of the records covered by this authorization, in most cases, has the right to inspect and receive a copy of the material to be disclosed pursuant to this consent form. Except for records of medication and somatic treatment, this right may be denied by the treatment facility director, or designee, during the patient's treatment under certain circumstances. A uniform and reasonable fee may be charged for a copy of the records. The fee may be reduced or waived in accordance with agency policy for those patients who show an inability to pay.

This information has been disclosed to you (*the W-2, County or Tribal Human/Social Services Agency*) from records protected by Federal confidentiality rules (42 CFR Part 2). The Federal rules prohibit you (*the W-2, County or Tribal Human/Social Services Agency*) from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is NOT sufficient for this purpose. The Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patient.

**A COPY OF THIS RELEASE IS AS VALID AS THE ORIGINAL
FOR OFFICE USE ONLY**

Information Requested:

By:

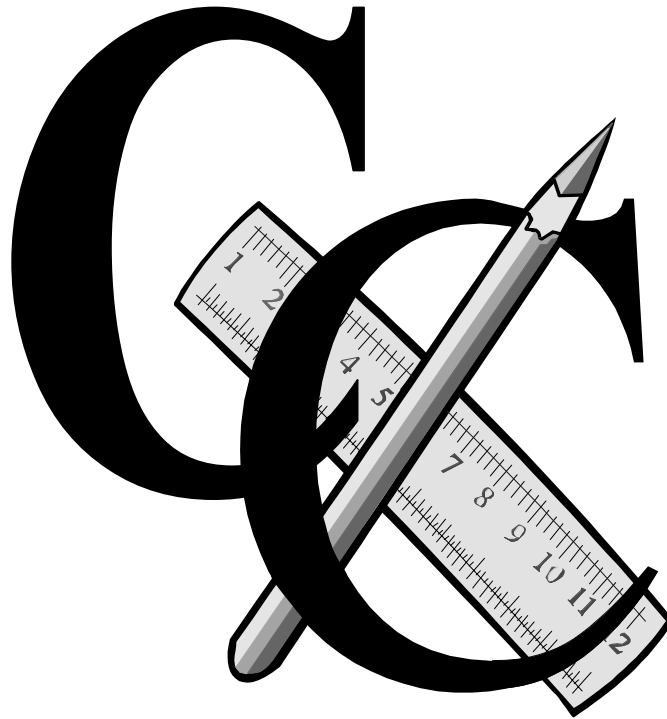
Title:

Date:

Response(s):

Initials:

Case Comments



A Self-Study Guide
For Eligibility Workers
And Case Managers

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Why Use Comments?

There are many reasons for recording comments, from documenting factual information to recording a justification for an action plan. Comments provide a summary record of case and individual history that can be used to understand what is happening with a case and, more importantly, **why** certain things are happening. Comments provide a chronological history of documentation either for a case or an individual that may be needed when reviewing a case for progress, quality assurance reviews, and when a case closes and subsequently reopens.

The Department of Workforce Development requires comments as a formal record of case action or program-related information for an individual. Workers should record comments immediately to ensure a sequential history. When comments are warranted they must be made no later than 24 hours after the action or contact with a participant.

Releasing Comments and Case Information

Most CARES comments (both Case and PIN level) are viewable to any individual who has query access on a statewide basis except for cases coded in CARES as confidential. Case level comments on these records are only viewable by the workers associated with the caseload.

As with any case information, workers must follow confidentiality policies. Information can be shared between or among personnel in the following circumstances:

- a need for the information in connection with their job duties;
- the communications are within a program or between a program, **and**
- the entity requesting has direct administrative control over the program (including Regional Area Administrators and Bureau of Work Support Programs [BWSP] staff).

Information released to individuals without CARES access requires written permission by the participant. The participant always has a right to view and receive a copy of their case record, including comments.

If an agency receives a request for information on a participant by an individual/agency outside of the program, do not release the information without receiving a signed release of information statement by the participant.

Prior to requesting information about a participant from another agency, complete an Authorization for Disclosure for Confidential Information form (DES form 10779):

- What type of information is requested; and
- If the information sharing is two-way; and
- Whether there is a set timeframe for the release or if it only lasts until the information is shared.

For detailed policy regarding releasing case information, refer to the Income Maintenance Manual, Chapter 2, Part B.

How to Document Comments

Subjective Vs. Objective Statements

Comments must be a factual record of case history and action. Workers are expected to maintain an objective stance in case management. Comments are written to describe information and a participant's behavior and are not to include bias or judgement by the worker. Comments that include subjective statements can quickly become discredited in an appeal process. The following are examples of subjective statements and an objective way to phrase the situation.

Subjective (Opinion)	Objective (Fact-based)
He was drunk.	The participant had an odor that smelled like alcohol.
She doesn't want to work.	Participant stated she wants to stay in the home to care for her child.
He will never get a job.	The participant has significant barriers to employment including no work history, no HS diploma or GED . . .
She isn't going to cooperate.	Participant stated she did not want to participate in the program.
He's a deadbeat dad.	He has not paid child support for the past two years.
She doesn't know how to dress.	Participant was asked to come in dressed for an interview. She came in soiled jeans and a tank top.
He's a liar.	The participant stated she was at the worksite. The supervisor confirmed she was not at the site.
She's a wonderful person.	The participant stated she is a people person who enjoys doing things for others.
He is very hostile.	Participant did not answer any of the questions and stated "It is none of your 'swear word' business." He then walked out of the office.
She needs to get a job.	The participant is two months behind in rent and does not have any source of income.
He doesn't care.	Participant has developed a pattern of no shows for activity and has not called to give reasons.

Subjective (Opinion)	Objective (Fact-based)
She is a terrible parent.	The participant has been unable to get the children to school on time or to get to the worksite on time in two weeks. She stated she is having a hard time getting the children moving in the morning.
He wanted to get fired.	Participant didn't show for work five days in a row without contacting the employer.
She really wants a job.	The participant completed 10 more employer contacts than required and stated she really wants a job.
She is enthusiastic.	She stated she was excited about working in the program and that she wanted to find employment.

In addition to avoiding subjective statements, workers must avoid entering personal comments in the case record. As case managers, workers are to remain objective and ensure that their personal values and opinions do not interfere with the process of providing effective case management.

Workers should also review comments for accuracy, comprehension, readability, grammar, and completeness.

Comments as Documentation

Comments should be used to document and summarize case action or individual program participation. Comments should be made when action is taken on a referral, when manual appointment notices are mailed, at the time of enrollment, after case reviews, changes in activities and EP, after contact with the participant and any other action that has effect on case information. The following are only a few examples of documentation that occurs in comments.

Duplicate comment entry in CARES is not necessary. Some CARES screens have comment fields available. If complete comments are entered in these fields, there is no need to repeat the comments on ACCC or CMCC.

Unscheduled Participant Contact

Comments are used to maintain participant contact documentation (in person, via telephone, by e-mail, or by postal mail). If the worker returns a call to a participant and leaves a message, that should be recorded in comments. Workers should also record when someone calls on behalf of the participant.

Example: The participant left message this morning stating she was unable to attend the workshop this afternoon due to illness. Returned call at 11:30am and requested she bring a Dr.'s excuse. See WPNH for details. Third consecutive missed day. Will updated Good Cause field if Dr. statement is received.

Manual Appointment Notices

When scheduling an appointment and sending out a manual notice, the worker should document the action in comments the day the notice is sent. It is not required to enter a comment when appointments are scheduled via Automated Client Scheduling (CCAS). Local agencies may determine it is good practice to make a brief note in comments to create a consistent record of contact.

Example: Mailed employability plan review appointment notice today for a 9am meeting on 2/12/2000.

Reported Changes

When a participant contacts a worker with a change, it should be entered on the appropriate screen(s) in CARES along with requesting verification of the change. A summary of the report and subsequent action should be recorded in comments if additional details are needed. Changes that may require clarification in comments include:

- Address Changes
- Loss of Job
- New Employment
- Income Changes
- Household Composition Changes (person add/delete)
- Request for Additional Program of Assistance

Example: Shanna reported a new job. Entered info on AFEI and sent her an Employer Verification form. I told her to return it within 10 days. See AFDE for prospective budget calculation.

NOTE: If this individual was in FSET or in W-2, comments should also reflect changes made to assignments/W-2 placement. The worker should also document any discussion with the participant regarding job retention issues, resources offered or provided, etc.

Intakes and Eligibility Reviews

ACCC displays as the first screen of the Interactive Interview and Review driver flows. Workers should record the purpose of the appointment, who is attending the appointment, what programs are being requested, and any other information known up front in the appointment.

It is recommended that workers have a note pad and keep notes during the intake/review and transfer them to comments at the end of the appointment. Notes should include clarification on issues that can't be explained easily on detail screens (such as medical issues, household crisis, justification behind how prospective estimates were determined, etc.).

Time Limits

It is very important to document in comments every occasion W-2 Time Limits are discussed with a participant. Time limits must be discussed at every W-2 eligibility review and Employability Plan review.

Example: Discussed time limits with participant during EP update today. She was handed the Time Limit brochure and a print out of the clock screen showing 10 months left in CSJ. Reviewed accomplishments of last 14 months (see prior comments). She stated she understands 10 months is not a lot of time. She completed 9 weeks of current work site successfully. We both decided she was job ready and she was placed on the Unsubsidized Employment Rung. She was given a number of job leads. Assigned to 30 hours of employment search and 10 hours of job readiness activities (continuing workshops on job retention, etc.). Developed new EP. I explained there was not a clock ticking while she was in the Unsubsidized Employment placement. Scheduled weekly review appointments on Mondays at 10am to evaluate progress.

Medical Information

Medical information related to eligibility and participation in work programs is indicated in a number of screens in CARES (ANDI, ANIC, WPWC, WPAW, WPJR), but none of the screens allow space for an explanation of the medical condition(s). This explanation/documentation should be recorded in comments.

Example: The participant submitted a completed medical exam form. It states he is unable to sit or stand for more than 20 minutes at a time. He is scheduled for back surgery in two weeks. The Dr. estimates a 12-week recovery period. Have determined the participant remains exempt from the FSET program. Updated ANDI and AI WP accordingly.

Working with Partnering Agencies

When another agency is partnering with the W-2 agency to provide services to a participant, the worker should record why another agency is involved, what is being done, and what is the expected outcome. In addition, any ongoing information or contacts should be recorded in comments.

Example: An appointment has been set up for 12/14 with Tom D. from DVR for an assessment/application for DVR services. The participant has physical barriers and DVR may be able to provide assistance in developing a long-range employment plan (see comments on 11/12/99 for details on disabilities).

Example: Met with participant and DVR representative today. The DVR application was completed and it was determined that DVR will work with the participant. A planning appointment was set up with the participant and DVR for 1/3. Updated EP and WPCH.

Third Party Contacts

When information is received by a worker from a third party source regarding a case or participant, the information must be recorded in comments. Third party contacts may be from an employer, landlord, partnering agency, housing authority, family member, friend, etc.

Example: Mark Jones from Acme Acres called today regarding the participant. He is her supervisor and reported that she was fired today because she has missed the past two days of work without contacting the employer. He faxed me verification of the termination. Entered information on AFEI. Left message on participant's answering machine to call me ASAP.

NOTE: If the above example was an FSET or W-2 participant, comments should also reflect that information was updated/entered on WPEH, WPCH, WPNH and any other relevant work program screens.

Fraud

Information related to a fraud investigation should be entered in CARES, but the worker must pay special attention to withholding any type of unofficial conclusion or any implied conclusion regarding the participant's intent. Only the facts are entered and the fraud investigation results should be recorded.

Example: As per Data Exchange, received employment information that was not previously reported by the participant. According to data exchange, has been employed for past four months. Sent request for verification to participant. Initiated fraud referral.

Comments as a Case Management Record

In addition to documentation, comments serve as a case management record. Comments should reflect the worker's assessment summaries, justification for action plans and statements of expected outcomes resulting from assignments and referrals.

Comments also provide a forum for a worker to justify the direction a participant's case management plan is going or to document professional conclusions by tying many factors together into a summary and explaining the reasons for an action.

Types of information that should be recorded in case comments to establish a case management record include:

- Identification of barriers
- Identification of resources
- Assessment results
- Enrollment information
- How the program is addressing barriers via activity
- Expected outcomes from action plan
- Case reviews
- Updates on participant progress (successes and failures) and documenting the "next step"
- Additional documentation of non-participation and why action taken was taken if not enough room on WPNH for complete details
- Identification of patterns and what is being done with the information to modify the action plan

Assessments

Whenever an initial or ongoing assessment is completed with a participant, the results must be recorded in comments. The assessment can be either formal or informal. The assessment information recorded in CARES should include background information, identified strengths, identified barriers, and identified resources and/or activities needed as a result of the assessment. Even though some information is "repeated" from CARES screens, the comments are used to create a complete "snap shot" of the case.

Example of Initial Assessment Entry: Completed initial assessment today. Donna is 23, two children: 3 yrs. and 4 months. Completed HS and reported no other education. Stated not confident in her writing or math abilities. Scheduled for the TABE tests next Tuesday.

Limited work experience (7 months in past 3 years), primarily in fast food (details on WPEL). Fired from her last three jobs due to poor attendance. She said she had a hard time dealing with her child and trying to work. Unemployed past 5 months. Interest in human services, but unsure of what area. Scheduled for COP/CAPS/COPS test for interest assessment.

The father of the both children is reported to be in jail. No child support has been paid. She reports they are no longer in a relationship. She volunteered that she is not involved in any relationship at this time.

Currently living with her mother until she can save enough money to get an apartment. Considers her lack of work experience and having young children her biggest barriers to employment. No child care arranged, mother and sister can watch the children in emergency situations only. Provided with a list of child care providers, explained the child care subsidy and gave her the phone number for Child Care Resource and Referral. See WPAW and WPJR for related information details.

She has access to mother's extra vehicle and has a driver's license, stated transportation is not a barrier. See WPJR for more details.

Assigned to a CSJ placement due to her lack of a good work history: 15 hours of WE for 6 weeks as an assessment at the Job Center in the Resource Room. Will use this to determine what issues surface regarding stated problems with attendance and interest in the human services field. After six weeks, will re-assess placement and number of hours. Children can attend the on-site child care. Assigned her to employment search activities for career assessment and interviewing skills. Assigned 10 hours of job readiness activities and workshops. After TABE results and career interest tests results next week, will evaluate for need of Adult Basic Education classes and/or job skills training.

Developed EP. Provided a worksite schedule and workshop schedule. Entered components on WPCS/WPCH. Related assessment details are on WPED, WPJR, and WPAS.

Assignment of Activity/Employability Plan Action

When an Employability Plan is created or updated clarify any details, when needed, in comments and explain **why** the specific activity was assigned (what was the identified issue and how the activity(ies) will address the issues, define the expected outcome). See prior example. When there is an update to activity, prior assessment information does not need to be repeated, only the outcomes of prior activity and reasons for new assignments.

CARES Assessment Screens

CARES assessment screens such as WPED, WPAW, WPJS, and WPEH are not designed to record the entire picture; rather, they gather assessment data for an individual by assessment type. Comments are used to tie major points into a cohesive summary about a case or individual and to expand beyond a “Y” or “N” indicator.

For example, on WPJR, there is a “Willing to Relocate” question (Y/N). What exactly does the participant mean by relocating? Do they mean across town? Do they mean from an upstairs apartment to a downstairs apartment? To any town where they have relatives? To a city that has public transportation? Only if a job pays at least \$8/hour? This type of information has a direct impact on the individual and his/her family and is best clarified in comments.

Sensitive Information

Cross-referencing of sensitive legally confidential information about barriers must occur in CMCC. However, any legally confidential information must only be generally referenced with further details being secured. Detailed information could include such items as mental health records, or AODA diagnosis and/or prognosis. The information may be kept in the paper file, but should be in a sealed envelope.

CARES is considered a location where participant confidence (a legal term) cannot be maintained. If sensitive information is recorded in the paper file, a cross-reference to the paper file must be made in CARES that indicates there is information in the file without actually identifying the details of the sensitive issue.

General sensitive information must be included in CMCC; however, details of the sensitive issue or barrier must be described in the paper file only. Store the legally confidential information in a sealed envelope in the paper file.

Example

part 1: The participant was referred for a mental health assessment. The assessment will be completed the week of March 27, 2000 and will take a total of 35 hours. An EP was developed for the current assessment activity and will be updated after the assessment results are received. Once the assessment is complete, appropriate activities will be determined and assigned.

part 2: A mental health assessment was completed and the participant is now participating in mental health treatment for 10 hours per week. See paper file for detailed assessment results. Motivational workshops for 10 hours per week and work experience for 5 hours per week are also assigned based on the assessment results. The EP was updated to reflect these changes.

Example: Participant is currently receiving AODA treatment for 10 hours per week. See paper case file for details of assessment and treatment notes.

The specific details of sensitive patient information should always occur in the paper case record (see BWSP Operations Memo 00-25 for more details). Sensitive participant information may include but is not limited to:

- Details of Assessments
- Medical Test results
- Treatment Notes
- Medical Diagnosis
- Information from third party sources (i.e., MH professional, medical professionals, AODA counselors, etc.)

The following list provides recommendations for what should be entered in paper file comments and what should be entered in CARES comments. ***This is not a comprehensive listing.***

CARES	
<ul style="list-style-type: none"> • Participant contact or lack of contact • Manual Appointment Notice reference • Reported Changes • Information from Intake and Eligibility Reviews • Time Limit discussions • Third Party Contact information • General Medical Information (sensitive information is documented in the paper file) • Cross-reference that information exists in the paper file • Reported Changes • Assessment Information • General information pertaining to partnering agencies working with participant (sensitive information is documented in the paper file) • Enrollment information/results • Employability reviews 	<ul style="list-style-type: none"> • Action plan justification/expected results • Identification of barriers (that are not sensitive) • Information on how barriers are being addressed • Updates on participant success and/or progress • Employment Information • Non-participation information or cross-reference to information on WPNP/WPNH • Acknowledgement of AODA treatment activities • Acknowledgment of mental health treatment activities
Paper File	
<ul style="list-style-type: none"> • AODA diagnosis and/or prognosis • AODA treatment facility name • AODA treatment plan • Mental health diagnosis and/or prognosis • Mental health treatment facility name • Mental health treatment plan 	<ul style="list-style-type: none"> • HIV/AIDS diagnosis and other similar physical health medical diagnosis • Sexually Transmitted Diseases (STD's)

Mental Health can refer to many situations including individuals receiving or not receiving treatment. Depression, Bi-polar disorder, rape, sexual abuse, suicide threats or attempts, and other similar situations can fall under mental health.

If a worker has a question on whether information should be withheld from CARES comments, s/he should consult with his/her supervisor. If further clarification is needed, a supervisor should contact the Area Administrator's office.

Organizing Comments

Enter comments immediately as events occur. This ensures comments are sequential and reflect a chronological history. Within only a few weeks of working with a participant, there can be a number of comment pages created for a case or individual. This can make it difficult to quickly “find” specific prior information. Regardless if comments are made in the paper file or in CARES, the worker should create concise, organized comments.

A key to effective case comments is taking good notes during a meeting or contact. Have a note pad available at all times to write notes as things happen. When a worker is ready to create comments, s/he should review the notes and figure out what needs to be entered in comments and in what order. After comments have been written, workers should review them for accuracy, comprehension, and completeness (before saving and exiting from CARES or inserting in the paper file).

CMCC and ACCC were never designed to be word processors. CARES functionality does not allow a worker to **bold**, *italicize*, or underline text to make it stand out. The same can be true if a worker is creating written notes for the paper file. So, workers have to find other ways to separate information in comments so that they can easily be found when scanning through 3, 10, 15 or more pages of case comments.

Suggested methods for Comment organization:

1. Use upper case symbols (such as **) to make comments stand out.

Example: **no call, no show for appointment**

2. Organize case comments by HEADINGS or TITLES. CARES already has a structure in place for natural headings (via screen names) such as:
 - Employment Information
 - Household composition
 - Education Background and Related Information
 - Job Readiness Issues
 - Employment and Related Goals
 - Action (Employability) Plan
 - Barriers (disabilities, crisis, etc.)
 - Child Care issues

Workers can also look at local intake forms as an outline format for entering case comments. In addition to using headers for comment entry after an enrollment or case review, they can be used for brief entries to mark a client contact, report of new information, etc. The following pages contain a few examples of how “Headers” can look in case comments in the CARES system. The same format can be applied to written comments for the paper file.

Example 1:

CMCC	CASE COMMENTS	12/08/99 14:31 XWI032 W JUDD
DATE ENTERED		
ENTERED BY	COMMENTS	
12 08 99	**EMPLOYMENT HISTORY**	
XWI032	THE PARTICIPANT HAS A LIMITED WORK HISTORY - PRIMARILY IN FAST FOOD (SEE WPEL FOR DETAILS). SHE HAS WORKED 7 OUT OF THE LAST 20 MONTHS. SHE STATES CHILD CARE HAS BEEN THE NUMBER ONE REASON FOR NOT KEEPING EMPLOYMENT.	
12 08 99	THE PARTICIPANT SAID SHE WOULD LIKE TO USE HER CUSTOMER SERVICE EXPERIENCE IN A JOB OTHER THAN FAST FOOD LIKE AT A BANK. SHE DOES . . .	

Example 2:

CMCC	CASE COMMENTS	12/08/99 14:31 XWI032 W JUDD
DATE ENTERED		
ENTERED BY	COMMENTS	
12 08 99	**NEW EMPLOYMENT**	
XWI032	THE PARTICIPANT CALLED TODAY TO REPORT A NEW JOB. SHE SAID SHE STARTED TODAY (12/8/99) SEE DETAILS ON AFEI AND WPEH MAILED EMPLOYER VERIFICATION FORM	

Example 3:

CMCC	CASE COMMENTS	12/08/99 14:31 XWI032 W JUDD
DATE ENTERED		
ENTERED BY	COMMENTS	
12 08 99	**PERSON ADD**	
XWI032	PARTICIPANT REPORTED HER BOYFRIEND HAS MOVED INTO THE HOME SHE REPORTS THEY DO EAT TOGETHER. SHE IS REQUESTING HE BE ADDED TO THE FS GROUP. COLLECTED INFORMATION OVER THE PHONE AND MAILED OUT A VERIFICATION CHECK LIST FOR THE PARTICIPANT.	

Example 4:

CMCC	CASE COMMENTS	12/08/99 14:31
DATE ENTERED		
ENTERED BY	COMMENTS	
12 08 99	**EDUCATION INFORMATION**	
XWI032	COMPLETED 11 GRADE.. TESTED HER ON THE TABE. SHE SCORED IN THE 11 TO 12 GRADE RANGE (SEE WPED FOR DETAILS)	
12 08 99	ATTENDED MATC FOR ONE SEMESTER IN 1997. SAID QUIT BECAUSE COULDN'T AFFORD THE TUITION. SHE CAN'T GET AID DUE TO A STUDENT LOAN DEFAULT FROM 1991. SHE GOT HER LPN IN 1990 FROM SW TECH. SHE REPORTS HER LICENSE IS EXPIRED. SHE SAID SHE IS INTERESTED IN GOING BACK TO SCHOOL FOR NURSING BUT ISN'T SURE IT . . .	

Example 5:

CMCC	CASE COMMENTS	12/08/99 14:31
		XWI032 W JUDD
COUNTY: 18	EAU CLAIRE	
PIN/CASE: 8509463239	NAME: MARIA	A BONGOLES
DATE ENTERED		
ENTERED BY	COMMENTS	
12 08 99	**CHILD CARE**	
XWI032	THE PARTICIPANT HAS BEEN DETERMINED ELIGIBLE FOR CHILD CARE	
	SHE HAS SELECTED A PROVIDER AND I CREATED AN AUTHORIZATION EFF	
	11/28 FOR SUNSHINE DAY CARE. CHILD CARE IS PROVIDED FOR HER W2	
12 08 99	ACTIVITIES. SHE IS AUTHORIZED THROUGH THE END OF HER EP.	

Headings provide a quick way to scan many pages of case comments to find a subject or issue. It is an excellent tool for reviewing a case history or researching an issue that was documented earlier in the case history.

Where to Document Comments

Comments should be recorded in the CARES system. Due to sensitivity issues, some comments are only made in the paper file. See the prior section on “Sensitive” information for more details on when to enter comments in a paper file verses the CARES system.

Comments in CARES

CARES comments are retained on CMCC and ACCC. CMCC is accessed using either a case number (Case-level CMCC) or a pin number (Individual-level CMCC). ACCC is exclusively in the economic support sub-system and is only accessed with a case number.

TIP:

CMCC was originally designed in CARES to accommodate two separate functions - ES for eligibility information (Case-level information) and WP for work program participation (PIN-level information). With the implementation of W-2, the same worker might perform work program case management and eligibility determination. It is recommended that agencies develop internal practices to be consistent among their workers on what type of information they record for case-level or PIN-level CMCC. Workers are not expected to duplicate comments in Case-level and PIN-level CMCC, although they may cross-reference comment information.

Keep in mind that Case-level comments are considered relevant to the case and PIN-level comments are considered relevant to an individual. If an individual leaves a case, any comments entered in Case-level Comments remain with the case and are not carried with the individual to a new/different case. Only PIN-level comments are carried over with the individual. This could affect tracking of WP participation by making some individual comments unavailable if all comments are entered in Case-level comments.

Case-level CMCC

TRAN: CMCC	PARMS: A/Case Number (To add new comments) PARMS: V/Case Number (To view existing comments) PARMS: V/Case Number//mmddyy (To view comments older than 90 days)
CMCC CASE COMMENTS 12/08/99 14:16 XWI032 W JUDD COUNTY: 18 EAU CLAIRE PIN/CASE: 8101952381 NAME: MARIA A BONGOLES DATE ENTERED ENTERED BY COMMENTS 12 08 99 _____ XWI032 _____ 12 08 99 _____ XWI032 _____ 12 08 99 _____ XWI032 _____ DO YOU WISH TO SAVE & EXIT ? _ DO YOU WISH TO SAVE & ADD MORE ? _ NEXT TRAN: _____ PARMS: A/8101952381_____	

Comments should be entered at intake, review, client contacts, and any time there are changes made to the case that affect eligibility or case management.

To save comments, the worker enters a “Y” in the *Save and Exit* field. If the worker has more comments to make than what fits on a single page, the worker can enter a “Y” in the *Save and Add More* field. The comments are saved and a new blank screen displays for more entry of comments.

TIP: Prior to completing the “Save and Exit” command from a comments screen, workers should review them for accuracy, comprehension, readability, grammar, and completeness. Once comments are saved in CARES, they are a permanent record and are unable to be corrected, modified, or deleted.

If a worker is querying comments, the most current comments display. The worker can use the F8 key to view more pages of comments and can use F7 to go back to previous screens. F16 allows the worker to “jump” to the last page of comments within the past 90 days. F17 allows the worker to “jump” back to the most current comment page.

The worker can add new comments from the query mode by pressing F5. A new, blank screen displays for new entry of comments.

DO YOU WISH TO SAVE & EXIT ? _	DO YOU WISH TO SAVE & ADD MORE ? _
PF5:ADD NEW COMNTS	PF16:VIEW LEAST CURR COMNTS PF17:VIEW MOST CURR COMNTS
NEXT TRAN: _____	PARMS: 8101952381_____

Retrieving Comments (Comment History)

Comments are maintained and viewed via CMCC. Comments are kept in the current record for 90 days. Date parameters are required to view comments that are older than 90 days. Comments are retrieved back to the date used in the parameters.

Example: Today's date is 2/12/2000 and a worker wants to view comments made at the last two reviews. The worker enters 070199 at the end of the parameters to display the last six months of comments. The most current comments display first.

NEXT TRAN: **CMCC** PARMS: V/8101952381//070191____(for Case-level CMCC comments)____

NEXT TRAN: **CMCC** PARMS: V//8501952323/070191____(for PIN-level CMCC comments)____

ACCC Comments

CMCC or ACCC can be used to view or enter case-level comments. The only difference between ACCC and CMCC is the parameters required to access the screen. ACCC only requires the case number in the parameters to view/create comments. ACCC displays at the beginning of the Intake and Review driver flows. Comments made on ACCC display in CMCC and case-level comments from CMCC display on ACCC (only for the last 90 days). The functionality is the same for both screens.

TRAN: ACCC	PARMS: Case Number	
ACCC	CASE COMMENTS	12/08/99 14:05 XWI032 W JUDD
COUNTY: 18 EAU CLAIRE		
PIN/CASE: 8101952381 NAME: MARIA A BONGOLES		
DATE ENTERED	ENTERED BY	COMMENTS
12 08 99	XWI032	_____
12 08 99	XWI032	_____
12 08 99	XWI032	_____
DO YOU WISH TO SAVE & EXIT ? _ DO YOU WISH TO SAVE & ADD MORE ? _		
NEXT TRAN: _____ PARMS: 8101952381_____		

PIN-level CMCC (Individual Comments)

TRAN: CMCC	PARMS: A//PIN	(To add new comments)
	PARMS: V//PIN	(To view existing comments)
	PARMS: V//PIN/mmddyy	(To view comments older than 90 days)

CMCC	CASE COMMENTS	12/08/99 14:31 XWI032 W JUDD
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COUNTY: 18 EAU CLAIRE
 PIN/CASE: 8509463239 NAME: MARIA A BONGOLES

DATE ENTERED	ENTERED BY	COMMENTS
12 08 99	XWI032	
12 08 99	XWI032	
12 08 99	XWI032	

DO YOU WISH TO SAVE & EXIT ? _ DO YOU WISH TO SAVE & ADD MORE ? _

NEXT TRAN: _____ PARMS: A//8509463239_____

While in a Work Program record (such as WPWI, WPCH, WPEL, WPCH, WPEL, WPED, WPAS, WPTN, etc.), CMCC can be accessed when a worker presses the F23 (to view comments) or F24 (to create comments).

Comments should be made when action is taken on a referral, when manual appointment notices are mailed, at the time of enrollment, after case reviews, changes in activities and EP, after contact with the participant and any other action.

Cross-Referencing Comments

Cross-referencing is a way to provide a complete record but not duplicate information. There are times when information can “fit” in more than one place but doesn’t need to be repeated in both places. For example, if sensitive information is recorded in the paper file, a cross-reference should be made in CMCC that information exists in the paper file. If an explanation of non-participation is completed on WPNH, it doesn’t need to be repeated in CMCC, but CMCC should make a reference that there was an instance of non-participation and reference WPNH with a date for details.

There are a number of screens in CARES like WPNH that have one to five lines available for a brief comment. Some of these include:

- AFDE (the detail screen for AFEI) – Earned Income Detail Screen
- AFUE (the detail screen for AFUI) – Unearned Income Detail Screen
- WPAW – Work Program Assessment of Work Goals
- WPJR – Work Program Job Readiness Assessment
- WPEH – Work Program Employment History
- WPNH – Work Program Non-Participation History

When information cannot be fully described on these comment lines, a worker can use the field to “cross reference” to CMCC with a date. If a worker does cross reference to comments, s/he should specify if they are in Case-Level CMCC or PIN-Level CMCC.

NOTE: Workers should not use free-format fields as additional comment fields (such as the address line on AFEI or fields on WPED).

Example: AFDE

COMMENT: PAID EVERY TWO WEEKS. WORKS 40 HOURS PER WEEK @ \$7/HR
80 X 2.15 X \$7 = 1,204.00
SEE CASE-LEVEL CMCC ON 12/07/99 FOR ADDITIONAL DETAILS RE: BUGETING
 PRESS ENTER TO RETURN TO EARNED INCOME SCREEN

Example: AFDU

COMMENT : STARTED RECEIVING 129.00/MO IN SS AFTER HER FATHER'S DEATH. SSA
LETTER STATES IT BEGAN ON 12/1/99 SEE CASE-LEVEL CMCC ON 12/7/99 FOR
FURTHER DETAILS ON INCOME
 PRESS ENTER TO RETURN TO UNEARNED INCOME SCREEN

Example: WPAW

PREFERRED WORK HOURS: 10 00 TO 15 00 DAYS: y y y y y n n
 UNABLE TO WORK HOURS: 19 00 TO 06 00 DAYS: y y y y y y y
 REASON UNABLE TO WORK: SEE PIN-LEVEL CMCC ON 12/9/99 FOR DETAILS .
 WORK ENVIRONMENT PREFERENCES: _ _ _ WILL RELOCATE (Y/N): _
 PF13 WPED PF15 WPJR PF16 WPJS PRINTS ON EMPLOYABILITY PLAN
 NEXT TRAN: _ PARS: 8509463239_

Example: WPJR

CONDITIONS AFFECTING PARTICIPATION: (C-CLIENT F-FAMILY MEMBER)
 MEDICAL: _ FAMILY PROBLEM: **F** HOUSING: _ LEGAL: _ OTHER: _
 OTHER AGENCY PARTIC.: _ NO/LIMITED ENGLISH: _ FELONY CONVICTION: _
 COMMENTS: SEE WP CMCC ON 12/0/99 FOR DETAILS ON FAMILY ISSUES
 OTHER LANGUAGE: _ VERBAL(Y/N): _ WRITTEN(Y/N): _
 CLIENT STATED LIMITATIONS: SEE PIN-LEVEL CMCC ON 12/9/99 FOR DETAILS
 SUPPORTIVE SERVICES NEEDED: WWTR _ _ _ _ _ JOB READY(Y/N): _
 PF13 WPED PF14 WPAW PF16 WPJS
 NEXT TRAN: _ PARS: 8509463239_

Example: WPNH

WPNH NON-PARTICIPATION HISTORY 12 07 99 16:18
 XWI032 W JUDD
 PIN: 8509463239 BONGOLES MARIA
 CTY/TRIBE: 18 REGION: OFFICE: 2111 NEXT PIN: _
 NON-PART DATE: 12 07 1999 THRU _ _ _ NON-PART OFFICE:
 COMP/STAT: MO ACTIVITY CODE: _
 NP TYPE: AE
 NP STATED RSN: EM
 NP HOURS: 02_ GC : N GC HOURS: _
 GC RSN: _
 PRIMARY COMMENT: MISSED JOB RETENTION WORKSHOP
 ADDITIONAL COMMENT: CALLED AND EXPLAINED REASONS. DETAILS ARE IN .
PIN-LEVEL CMCC ON 12/7/99. THE STATED EMERGENCY
IS NOT CONSIDERED GOOD CAUSE
 PF19 WPNP PF14 COPY TO SAME PIN PF15 COPY TO NEW PIN PF13 WPNH
 NEXT TRAN: _ PARS: 8509463239_

Example: WPEH

WPEH EMPLOYMENT HISTORY 12 07 99 16:21
 XWI032 W JUDD
 PIN: 8509463239 WDA: CTY/TRIBE: 18
 NAME: BONGOLES MARIA A OFFICE: 2111
 ENTERED EMPLOYMENT(Y/N): Y
 BEGIN DATE: 11 01 1999 END DATE: 12 04 1999
 PROVIDER ID: 0001 STAFF ID: XWI032
 DURATION: _ FULLTIME LESS THAN 30 DAYS _ PARTTIME LESS THAN 30 DAYS
 X FULLTIME 30 DAYS OR MORE _ PARTTIME 30 DAYS OR MORE
 EMPLOYER TYPE: PUBLIC _ PRIVATE X AVG HRS/WEEK: 40
 EMPLOYER NAME: ACME ACRES EMPLOYER SEQ NUM: 00
 ADDRESS: 412 E MADISON ST
 CITY: MADISON STATE: WI ZIP: 53704
 DOT: 249 HOURLY WAGE: 07.10 PAY CODE: HR
 JOB DUTIES: ADMINISTRATIVE ASSISTANT
SEE PIN-LEVEL CMCC ON 12/7/99
FOR DETAILS REASON FOR LEAVING: QT
 MEDICAL BENEFITS: F OTHER BENEFITS: ML
 PF13 WPED PF14 WPFT-30 PF15 WPFT-180
 NEXT TRAN: _ PARS: 8509463239_

Multiple Worker Entry

With many cases, there could be multiple workers entering comments in the CARES system. An SSP and FEP may both be entering case-level comments and multiple providers may be entering PIN-Level (individual) comments. Regardless how many workers are entering comments, it must be remembered that all entries are part of the entire case. Comments should not be duplicated. If multiple workers are entering comments, existing comments should be reviewed prior to a new entry to ensure the information is not already entered in CARES.

Workers who are not the main worker for a case/individual (such as a child care worker, clerical worker, fraud investigator, workshop coordinator, etc.) should limit their comments to only their agency-defined role with the participant. It is recommended if a partnering worker has information regarding the participant that is beyond their agency-defined role, it should be shared with the primary worker (such as the FEP or SSP).

All workers entering comments must be aware of and follow comment guidelines set forth by the Division of Economic Support.

Final Thoughts

As stated at the beginning, there are many reasons for recording comments, from documenting factual information to recording a justification for an action plan. Comments provide a summary record of case and individual history that can be used to understand what is happening with a case and, more importantly, **why** certain things are happening. Comments provide a chronological history of documentation either for a case or an individual that may be needed when reviewing a case for progress, quality assurance reviews and when a case closes and subsequently reopens.

It is important that every case contains concise, comprehensible, and complete comments regarding case and individual history/action. Comments, when done consistently, become one of the best resources and tools for case information.